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9 Attorneys for Plaintiff
10 UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 SEE ATTACHMENTS "EXHIBIT 1" AND
"EXHIBIT 2"

No. CR SEE ATTACHMENTS

14 GOVERNMENT'S EX PARTE APPLICATION
15 FOR ORDER SEALING MATTERS LISTED
16 IN EXHIBIT 1 AND UNSEALING MATTERS
LISTED IN EXHIBIT 2

17 **(UNDER SEAL)**

18 Plaintiff United States of America, by and through its counsel
19 of record, the Acting United States Attorney for the Central District
20 of California and Assistant United States Attorney MiRi Song, hereby
21 applies ex parte for an order (1) to seal the matters listed in
22 Exhibit 1, along with this ex parte application and proposed order,
23 and (2) to unseal the matters listed in Exhibit 2.

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This ex parte application is based upon the attached declaration of MiRi Song.

Dated: March 11, 2025

Respectfully submitted,

JOSEPH T. MCNALLY
Acting United States Attorney

LINDSEY GREER DOTSON
Assistant United States Attorney
Chief, Criminal Division

/s/ MiRi Song
MIRI SONG
Assistant United States Attorney

Attorneys for Plaintiff
UNITED STATES OF AMERICA

DECLARATION OF MIRI SONG

I, MiRi Song, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California, and I am one of the attorneys representing the government on multiple matters that are currently pending before this Court that charged violation(s) of 8 U.S.C. § 1326.

2. The government requests that the matters listed in Exhibit 1, along with this ex parte application and proposed order, be filed or remain under seal. The named defendants in these matters have not been taken into custody on the charge(s) contained in the complaints and have not been informed that they are being named as a defendant in a criminal matter.

3. If these matters were publicly available, that may result in defendants being notified and fleeing from prosecution and may also result in increased safety risks to the law enforcement officers, who are tasked with executing the outstanding arrest warrants for said defendants.

4. Accordingly, the government requests that the matters listed in Exhibit 1, along with this ex parte application and proposed order, be sealed and remain so until defendants are arrested and taken into custody on the charge(s) alleged in their respective criminal complaints.

5. The government submits that an individual matter should be unsealed at the earliest time practicable, specifically when the dangers mentioned in the preceding paragraph are dissipated. Thus, the government requests that matters listed in Exhibit 1 be unsealed at the time of defendants' arrest, rather than at the initial

1 || appearances.

2 6. Lastly, the government requests that the matters listed in
3 Exhibit 2 be unsealed to the extent that they are sealed, as the
4 defendants in those matters have been arrested and/or made their
5 initial appearances already.

6 I declare under penalty of perjury under the laws of the United
7 States of America that the foregoing is true and correct and that
8 this declaration is executed at Los Angeles, California, on March 11,
9 2025.

/s/ MiRi Song
MIRI SONG

1 JOSEPH T. MCNALLY
2 Acting United States Attorney
3 LINDSEY GREER DOTSON
4 Assistant United States Attorney
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9 Attorneys for Plaintiff
10 UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 SEE ATTACHMENTS "EXHIBIT 1" AND
14 "EXHIBIT 2"

No. CR 25-

15 [PROPOSED] ORDER SEALING MATTERS
LISTED IN EXHIBIT 1 AND UNSEALING
MATTERS LISTED IN EXHIBIT 2

16 **(UNDER SEAL)**

17
18 For good cause shown, IT IS HEREBY ORDERED THAT:

19 The government's ex parte application for an order sealing
20 matters listed in Exhibit 1 and unsealing matters in Exhibit 2 is
21 GRANTED. The matters listed in Exhibit 1, along with the
22 government's ex parte application, shall be sealed. Such matters
23 will automatically be unsealed at the moment of a defendant's arrest,
24 rather than at a later point, such as at the initial appearance.

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1 It is further ordered that the matters listed in Exhibit 2 be
2 unsealed, as the defendants in those matters have already been
3 arrested and/or made their initial appearances, thus obviating the
4 need to seal for dangers of flight from prosecution and dangers to
5 law enforcement officers tasked with executing any outstanding arrest
6 warrants.

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9 DATE

THE HON. BRIANNA FULLER MIRCHEFF
UNITED STATES MAGISTRATE JUDGE

10 Presented by:

11 /s/ MiRi Song

12 MIRI SONG
13 Assistant United States Attorney

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EXHIBIT 1

EXHIBIT 1

- 1 1. 2:24-MJ-6452
- 2 2. 2:25-CR-91-FMO
- 3 3. 2:25-CR-92-FMO
- 4 4. 2:25-CR-98-MWC
- 5 5. 2:25-MJ-52
- 6 6. 2:25-MJ-534
- 7 7. 2:25-MJ-675
- 8 8. 2:25-MJ-683
- 9 9. 2:25-MJ-695
- 10 10. 2:25-MJ-753
- 11 11. 2:25-MJ-757
- 12 12. 2:25-MJ-767
- 13 13. 2:25-MJ-773
- 14 14. 2:25-MJ-784
- 15 15. 2:25-MJ-813
- 16 16. 2:25-MJ-815
- 17 17. 2:25-MJ-816
- 18 18. 2:25-MJ-821
- 19 19. 2:25-MJ-831
- 20 20. 2:25-MJ-832
- 21 21. 2:25-MJ-835
- 22 22. 2:25-MJ-836
- 23 23. 2:25-MJ-846
- 24 24. 2:25-MJ-851
- 25 25. 2:25-MJ-857
- 26 26. 2:25-MJ-867
- 27 27. 2:25-MJ-869
- 28 28. 2:25-MJ-879

1 29. 2:25-MJ-880
2 30. 2:25-MJ-883
3 31. 2:25-MJ-889
4 32. 2:25-MJ-905
5 33. 2:25-MJ-954
6 34. 2:25-MJ-666
7 35. 2:25-MJ-758
8 36. 2:25-MJ-887
9 37. 2:25-MJ-870
10 38. 2:25-MJ-873
11 39. 2:25-MJ-878
12 40. 2:25-MJ-879
13 41. 2:25-MJ-884
14 42. 2:25-MJ-885
15 43. 2:25-MJ-886
16 44. 2:25-MJ-888
17 45. 2:25-MJ-890
18 46. 2:25-MJ-891
19 47. 2:25-MJ-894
20 48. 2:25-MJ-899
21 49. 2:25-MJ-903
22
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EXHIBIT 2

1 **EXHIBIT 2**

2 1. 2:25-MJ-00738
3 2. 2:25-MJ-00848
4 3. 2:25-CR-00097
5 4. 2:25-MJ-00528
6 5. 2:25-MJ-00573
7 6. 2:25-MJ-00651
8 7. 2:25-MJ-00680
9 8. 2:25-MJ-00682
10 9. 2:25-MJ-00690
11 10. 2:25-MJ-00720
12 11. 2:25-MJ-00730
13 12. 2:25-MJ-00765
14 13. 2:25-MJ-00771
15 14. 2:25-MJ-00781
16 15. 2:25-MJ-00828
17 16. 2:25-MJ-00847
18 17. 2:25-MJ-00850
19 18. 2:25-MJ-00872
20 19. 2:25-MJ-00875
21 20. 2:25-MJ-00897
22 21. 2:25-MJ-00900
23 22. 2:25-MJ-00901
24 23. 2:25-MJ-00929